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VIA EFILE

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007
(212) 805-6350
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*, No. 21-cv-2684-VEC

Dear Judge Caproni,

Following the telephonic discovery hearing held on January 21, 2022, the parties have conferred on a proposed order memorializing the Court's oral rulings on the issues raised with the Court. An agreed proposed order, attached as **Exhibit A**, is jointly submitted by the parties for the Court's consideration.

The parties thank the Court for its assistance in resolving this issue.

Sincerely,

By: /s/ Dennis H. Tracey
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